STATE OF SO	OUTH CAROLIN	<b>A</b> )		198034		
(Caption of Case) In Re: Sage Telecom, LLC			) BEFORE THE ) PUBLIC SERVICE COMMISSION ) OF SOUTH CAROLINA			
		)	) COVER SHEET			
		)		#2 11-3-8 1000		
		)	) DOCKET ) NUMBER: 2008 - 307 - C			
		,				
		)	•			
		<b>)</b> )				
(Please type or print	)	<u> </u>				
Submitted by: Margaret M. Fox, Es		ox, Esquire S	SC Bar Number: 65418			
Address:	McNair Law Firm, P.A.		Telephone: 803-799	9-9800		
	Post Office Box	11390 F	Fax: 803-753	-3219		
	Columbia, SC 2	29211	Other:			
	This form is required	contained herein neither replaces n for use by the Public Service Con				
Other:	heck one)	NATU	RE OF ACTION (Check a	ll that apply)		
☐ Electric		Affidavit	Letter	Request		
Electric/Gas		Agreement	Memorandum	Request for Certification		
☐ Electric/Telecon	nmunications	Answer	Motion	Request for Investigation		
☐ Electric/Water		Appellate Review	Objection	Resale Agreement		
Electric/Water/Telecom.		Application	Petition	Resale Amendment		
☐ Electric/Water/Sewer		Brief	Petition for Reconsiderati	on Reservation Letter		
Gas		Certificate	Petition for Rulemaking	Response		
Railroad		Comments	Petition for Rule to Show Ca	Response to Discovery		
Sewer		Complaint	Petition to Intervene	Return to Petition		
Telecommunicat	tions	Consent Order	Petition to Intervene Out of	Time Stipulation		
☐ Transportation		Discovery	Prefiled Testimony	Subpoena		
Water		Exhibit	Promotion	Tariff		
☐ Water/Sewer		Expedited Consideration	Proposed Order	Other:		
Administrative N	<b>M</b> atter	Interconnection Agreement	Protest	The		
Other:		Interconnection Amendment	Publisher's Affidavit			
		Late-Filed Exhibit	Report	D TANK BIND		

### McNair Law Firm, P.A.

ATTORNEYS AND COUNSELORS AT LAW

11<sup>th</sup> Floor . Bank of America Tower Post Office Box 11390 1301 Gervais Street (29201) COLUMBIA, SOUTH CAROLINA 29211

TELEPHONE (803) 799-9800 FACSIMILE (803) 376-2219

September 12, 2008

The Honorable Charles Terreni Chief Clerk and Administrator South Carolina Public Service Commission Post Office Box 11649 Columbia, South Carolina 29211

Re: Application of Sage Spectrum, LLC for a Certificate of Public Convenience and Necessity to Provide Facilities-based and Resold Local Exchange, Access, and Interexchange Telecommunications Services in the State of South Carolina (SCPSC Docket No. 2008-307-C)

Dear Mr. Terreni:

Please find enclosed for filing on behalf of the South Carolina Telephone Coalition an original and ten (10) copies of a Petition to Intervene in the above-referenced docket. By copy of this letter and Certificate of Service appended to the Petition, I am serving all parties of record.

Please clock in a copy of the Petition and return it by our courier.

Should you have any questions with respect to this matter, please do not hesitate to contact me.

Very truly yours,
Mayauth. Tas

Margaret M. Fox

Enclosures

cc: Bonnie D. Shealy, Esquire Florence P. Belser, Esquire

### **BEFORE**

# THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

Re:	Application of Sage Telecom, LLC, for a	)	
	Certificate of Public Convenience and Necessity	· )	
	to Provide Facilities-based and Resold Local	)	
	Exchange, Access, and Interexchange Tele-	)	CERTIFICATE OF
	communications Services in the State of	)	SERVICE
	South Carolina	)	
		)	

I, ElizaBeth A. Blitch, do hereby certify that I have this date served one (1) copy of the foregoing Petition to Intervene upon the following party of record by causing said copy to be deposited with the United States Mail, first class postage prepaid to:

Bonnie D. Shealy, Esquire Robinson McFadden & Moore, PPC Post Office Box 944 Columbia, South Carolina 29202

Nannette S. Edwards, Esquire Office of Regulatory Staff Post Office Box 11263 Columbia, South Carolina 29211.

EnzaBeth A. Blitch, Paralegal McNair Law Firm, P.A.

Post Office Box 11390

Columbia, South Carolina 29211

(803) 799-9800

September 12, 2008

Columbia, South Carolina

#### **BEFORE**

## THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

Docket No. 2008-307-C

Re:	Application of Sage Telecom, LLC, for a	)	2
	Certificate of Public Convenience and Necessity	)	Ć.
	to Provide Facilities-based and Resold Local	)	, .
	Exchange, Access, and Interexchange Tele-	)	PETITION TO
	communications Services in the State of	)	INTEDVENE
	South Carolina	) INTER	INTERVENE
		)	

In response to the Commission's Notice of the Filing of the Application of Sage Spectrum, LLC for a Certificate of Public Convenience and Necessity to provide local exchange telecommunications services in South Carolina, the South Carolina Telephone Coalition ("SCTC") submits the within Petition to Intervene in this proceeding. In support of its Petition, SCTC would respectfully show unto this honorable Commission that:

- 1. SCTC is a coalition of local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission.
- 2. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record insofar as its interests might appear.
- 3. SCTC's individual member companies provide local exchange telephone service within their respective geographic service areas. SCTC's position in this docket is that statewide certification of new entrant local exchange telecommunications service providers is not appropriate and is not in the public interest. The Application, as currently drafted, would potentially impact each of the SCTC member companies and, therefore, the SCTC has an interest in this proceeding.

4. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

M. John Bowen, Jr.
Margaret M. Fox
Sue-Ann Shannon Gerald
McNair Law Firm, P.A.
Post Office Box 11390
Columbia, South Carolina 29211
(803) 799-9800

By:

Attorneys for Intervenor South Carolina Telephone Coalition

September 12, 2008

Columbia, South Carolina